

STRICKEN PURSAUNT TO THE #2301
ORDER ENTERED 6/9/2016

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

**IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION**

**Consolidated Trial
Mullins, et al. v. Ethicon, Inc., et al.
Case No. 2:12-cv-02952**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

THIS DOCUMENT RELATES TO:

Sandra Cheshire, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-24999

Elizabeth Mullens, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-16564

Crystal Barr, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-22606

Janet Burgoyne, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-28620

Debra Daniel, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-02565

Rita Dillon, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-02919

Carolyn Garcia v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-14355

Karen Gillum, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-12756

Patricia Martinez v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-04730

Terreski Mullins, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:12-cv-02952

Judith Shears, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-17012

Janice Tyler, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-19110

Carol Whisner, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-13023

Marianna Humbert v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-10640

Jane Kelly, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-22079

Rebecca Sprout, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:12-cv-07924

Teresa Bennett, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-29624

Kathy Jones, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:14-cv-09517

Theresa Vanbuskirk, et al. v. Ethicon, Inc., et al.
Civil Action No. 2:13-cv-16183

**PLAINTIFF, JUDITH SHEARS' NOTICE OF VIDEOTAPED DEPOSITION OF
RONALD L. RINK AND SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiff shall take the discovery deposition upon oral examination of Ronald L. Rink at Courtyard Pittsburgh Downtown, 945 Penn Avenue, Pittsburgh, Pennsylvania, 15222, for the following cases on the dates and times indicated below:

Burgoyne	June 21, 2016	9:00 a.m.
Vanbuskirk	June 21, 2016	12:00 p.m.
Barr	June 21, 2016	3:00 p.m.

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Cheshire	June 22, 2016	9:00 a.m.
Daniel	June 22, 2016	12:00 p.m.
Dillon	June 22, 2016	3:00 p.m.
Garcia	June 23, 2016	9:00 a.m.
Gillum	June 23, 2016	12:00 p.m.
Martinez	June 23, 2016	3:00 p.m.
Mullins	June 24, 2016	9:00 a.m.
Shears	June 24, 2016	12:00 p.m.
Tyler	June 24, 2016	3:00 p.m.
Whisner	June 27, 2016	9:00 a.m.
Humbert	June 27, 2016	12:00 p.m.
Kelly	June 27, 2016	3:00 p.m.
Sprout	June 28, 2016	9:00 a.m.
Bennett	June 28, 2016	12:00 p.m.
Jones	June 28, 2016	3:00 p.m.
Mullens	June 29, 2016	9:00 a.m.

The deposition shall be recorded by stenographic means before a person duly authorized to administer oaths and will be videotaped.

PLEASE TAKE FURTHER NOTICE that in connection with the taking of the deposition, the deponent shall produce the items described below:

1. Any and all files relating to deponent's time as a Sales Representative for Ethicon.
2. Deponent's current Curriculum Vitae.
3. Any and all training materials, handouts, manuals, or the like in deponent's possession provided by Ethicon in regards to detailing pelvic mesh products.
4. Any and all materials in deponent's possession provided by counsel for Ethicon, including, but not limited to, documents, correspondence, statements, transcripts, or records.

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Date: June 6, 2016

Respectfully submitted,

By: /s/ Jeffrey L. Haberman
Jeffrey L. Haberman
**SCHLESINGER LAW OFFICES,
P.A.**
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ATTORNEY FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Jeffrey L. Haberman
Jeffrey L. Haberman
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